

RIMON P.C.

Proposed Attorneys for Kenneth P. Silverman, Esq.,
the Chapter 7 Trustee
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753
(516) 479-6300
Brian Powers
Haley L. Trust

Presentment Date: January 29, 2024

Time: 12:00 noon

Objections Due: January 29, 2024

Time: 11:30 noon

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re:

Chapter 7

LIBERTY BRIDGE CAPITAL MANAGEMENT
GP, LLC, et al.,

Case No. 20-10009 (JPM)
(Jointly Administered)

Debtors.

-----X

**NOTICE OF PRESENTMENT OF TRUSTEE'S APPLICATION
FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT OF
RIMON P.C. AS SUBSTITUTE ATTORNEYS FOR THE
TRUSTEE EFFECTIVE AS OF OCTOBER 2, 2023**

PLEASE TAKE NOTICE, that on **January 29, 2024 at 12:00 noon**, upon the application dated December 28, 2023 (the "Application") of Kenneth P. Silverman, Esq., the chapter 7 trustee (the "Trustee") of the jointly administered bankruptcy estates (the "Estate") of Liberty Bridge Capital Management GP, LLC, Cash4Cases, Inc., Liberty Bridge Capital Management IM, LLC, Liberty Bridge Capital Management, L.P., Liberty Bridge Finco LLC, Liberty Bridge Settlement Clearing, LLC, Diversified Pre-Settlement Portfolio I, a Series of Liberty Bridge Capital Management, L.P., and Diversified Pre-Settlement Portfolio II, a Series of Liberty Bridge Capital Management, L.P., (collectively, the "Debtors"), will present an order in accordance with Bankruptcy Code §327(a) (the "Proposed Order"), seeking to retain Rimon P.C., as Substitute Attorneys for the Trustee, to the Honorable John P. Mastando III, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton U.S. Custom House, One Bowling Green, New York, New York 10004-1408.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the entry of the Proposed Order shall be in writing, must be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court's electronic case filing system, and by all other parties in interest, mailed to the Clerk of the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton U.S. Custom House, One Bowling Green, New York, New York 10004-1408, with a hard copy delivered directly to the Chambers of the Honorable John P. Mastando III, and served in accordance with General Order M-399 or other form upon: (i) proposed attorneys for the Trustee, Rimon P.C., 100 Jericho Quadrangle, Suite 300, Jericho, New York, 11753, Attention: Brian Powers, Esq., and (ii) the U.S. Department of Justice, Office of the United States Trustee, One Bowling Green, Room 534, New York, New York 10004, so as to be received no later than **January 29, 2024 at 11:30 a.m.**

PLEASE TAKE FURTHER NOTICE, that if a timely objection is filed, the Court may schedule a hearing on the Application.

Dated: Jericho, New York
January 5, 2024

RIMON P.C.
Proposed Counsel to Kenneth P. Silverman, Esq.,
the Chapter 7 Trustee

By: s/ Brian Powers
Brian Powers
Partner
100 Jericho Quadrangle, Suite 300
Jericho, NY 11753
(516) 479-6300

RIMON P.C.

Proposed Counsel to Kenneth P. Silverman, Esq.,
the Chapter 7 Trustee
100 Jericho Quadrangle, Suite 300
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 7

LIBERTY BRIDGE CAPITAL MANAGEMENT
GP, LLC, et al.,

Case No. 20-10009 (JPM)
(Jointly Administered)

Debtors.
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**TRUSTEE'S APPLICATION FOR ENTRY OF AN
ORDER AUTHORIZING THE EMPLOYMENT OF RIMON P.C. AS
ATTORNEYS FOR THE TRUSTEE EFFECTIVE AS OF OCTOBER 2, 2023**

By this application (the "Application"), Kenneth P. Silverman, Esq., the chapter 7 trustee (the "Trustee") of the jointly administered bankruptcy estates (the "Estate") of Liberty Bridge Capital Management GP, LLC, Cash4Cases, Inc., Liberty Bridge Capital Management IM, LLC, Liberty Bridge Capital Management, L.P., Liberty Bridge Finco LLC, Liberty Bridge Settlement Clearing, LLC, Diversified Pre-Settlement Portfolio I, a Series of Liberty Bridge Capital Management, L.P., and Diversified Pre-Settlement Portfolio II, a Series of Liberty Bridge Capital Management, L.P., (collectively, the "Debtors"), seeks the authority to employ Rimon P.C. ("Rimon") as counsel to the Trustee, and respectfully represents:

1. On January 3, 2020, the Debtors filed voluntary petitions for relief under chapter 7 of Title 11, United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of New York (the "Court").

2. On January 3, 2020, Kenneth P. Silverman, Esq., was appointed the interim chapter 7 trustee in each of the Debtors' cases. The Trustee has since duly qualified, and is the permanent Trustee in this case.

3. By Order of the Court dated January 10, 2020, the Debtors' cases were jointly administered (ECF Doc. No. 8).

4. Shortly after his appointment, the Trustee determined that it was necessary to employ counsel on his behalf in this case in order to assist him in the orderly administration of this estate. Accordingly, the Trustee filed an application to retain SilvermanAcampora LLP ("SilvermanAcampora") as his general bankruptcy counsel, which was granted by this Court on February 28, 2020 (ECF Doc. No. 46).

5. Effective as of October 2, 2023, SilvermanAcampora closed on a transaction whereby all of SilvermanAcampora's attorneys and legal personnel have joined Rimon, and SilvermanAcampora will no longer engage in the practice of law.

6. Accordingly, the Trustee requires replacement counsel for SilvermanAcampora and requests that Rimon be retained as his attorneys effective as of October 2, 2023. The Trustee believes that Rimon is well qualified to act as his attorneys and to represent him as the Trustee in this case, especially considering that the same attorneys from SilvermanAcampora that previously represented the Trustee in this case would continue to represent the Trustee at Rimon.

7. In order to ensure that the Trustee did not have a lapse in representation, Rimon attorneys began working with the Trustee on October 2, 2023. To the best of the Trustee's knowledge, Rimon has no connection with the Debtors' creditors or any other party in interest or their respective attorneys, except as set forth in the declaration of Brian Powers, Esq., a Partner of Rimon (the "Declaration") annexed hereto as **Exhibit A**. Rimon represents no interest adverse to

the Debtor or the Estate, or any other interested person in the matters with respect to which Rimón is being retained by the Trustee, except as set forth in the Declaration.

8. Rimón is a “disinterested person” as that term is defined in §101(14) of the Bankruptcy Code and that said firm, except as set forth in the Declaration:

- (a) is not a creditor, equity security holder, or insider;
- (b) is not and was not, within two (2) years before the date of the filing of the petition, a director, officer, or employee of the Debtors; and
- (c) does not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors, or for any other reason.

9. Based on the foregoing, the Trustee submits that the retention of Rimón as of October 2, 2023, is not only necessary, but is also in the best interest of the Estate. Moreover, the Trustee requests that SilvermanAcampora be relieved as his counsel upon the Court’s authorization of the Trustee’s retention of Rimón.

WHEREFORE, the Trustee respectfully requests the entry of the annexed order authorizing the retention of Rimón P.C., and that the Court grant such other and further relief as may be deemed just and proper.

Dated: Jericho, New York
December 28, 2023

s/ Kenneth P. Silverman
Kenneth P. Silverman, Esq.